

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE \* BKRTCY. NO. 13-06181 MCF  
JOSE JUAN RIVERA RODRIGUEZ \* CHAPTER 13  
WANDA IVETTE SANTIAGO PAGAN \*  
DEBTORS

**NOTICE OF FILING OF AMENDED CHAPTER 13 PLAN  
AND CERTIFICATE OF SERVICE**

TO THE HONORABLE COURT:

COME NOW, **JOSE JUAN RIVERA RODRIGUEZ** and **WANDA IVETTE SANTIAGO ROMAN**, debtors in the above captioned case, through the undersigned attorney and very respectfully state and pray as follows:

1. The debtors are hereby submitting an amended Chapter 13 Plan, dated April 14, 2014, herewith and attached to this motion.

2. This amendment is filed to provide a new "payment plan schedule" increasing the Plan payment to \$450.00, at month 49 of the Plan, thus, increasing the Plan base to \$14,750.00 to cure the "insufficiently funded" issue raised by the Chapter 13 Trustee at the 341 meeting of creditors. The proposed amended Plan also deletes the "tax refund" provision.

I CERTIFY, that on this same date a copy of this Notice was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, and all CM/ECF participants; I also certify that a copy of this notice was sent via regular mail to the debtor and to all creditors and interested parties appearing in the master address list, hereby attached.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 14<sup>th</sup> day of April, 2014.

/s/Roberto Figueroa Carrasquillo  
ROBERTO FIGUEROA CARRASQUILLO  
USDC #203614  
ATTORNEY FOR PETITIONER  
PO BOX 186 CAGUAS PR 00726  
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United States Bankruptcy Court  
District of Puerto Rico

IN RE:

Case No. 3:13-bk-6181

RIVERA RODRIGUEZ, JOSE JUAN & SANTIAGO PAGAN, WANDA IVETTE

Chapter 13

Debtor(s)

**AMENDED CHAPTER 13 PAYMENT PLAN**

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee  directly  by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____	<input checked="" type="checkbox"/> AMENDED PLAN DATED: <u>4/14/2014</u> Filed by: <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other
<b>I. PAYMENT PLAN SCHEDULE</b>	
\$ <u>200.00</u> x <u>49</u> = \$ <u>9,800.00</u>	
\$ <u>450.00</u> x <u>11</u> = \$ <u>4,950.00</u>	
\$ _____ x _____ = \$ _____	
\$ _____ x _____ = \$ _____	
\$ _____ x _____ = \$ _____	
TOTAL: \$ <u>14,750.00</u>	
Additional Payments: \$ _____ to be paid as a LUMP SUM within _____ with proceeds to come from:	
<input type="checkbox"/> Sale of Property identified as follows: _____	
<input type="checkbox"/> Other: _____	
Periodic Payments to be made other than, and in addition to the above: \$ _____ x _____ = \$ _____	
PROPOSED BASE: \$ <u>14,750.00</u>	
<b>III. ATTORNEY'S FEES</b> (Treated as § 507 Priorities)	
Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ <u>2,881.00</u>	
Signed: <u>/s/ JOSE JUAN RIVERA RODRIGUEZ</u> Debtor	
<u>/s/ WANDA IVETTE SANTIAGO PAGAN</u> Joint Debtor	
<b>II. DISBURSEMENT SCHEDULE</b>	
A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____	
B. SECURED CLAIMS: <input type="checkbox"/> Debtor represents no secured claims. <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows:	
1. <input checked="" type="checkbox"/> Trustee pays secured ARREARS: Cr. <u>BANCO POPULAR D</u> Cr. _____ Cr. _____ # <u>71010011671636</u> # _____ # _____ \$ <u>9,514.36</u> \$ _____ \$ _____	
2. <input type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____	
3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____	
4. <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder: _____	
5. <input type="checkbox"/> Other: _____	
6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to: <b>BANCO POPULAR D</b>	
C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2)	
D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims.	
1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____ <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____ Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____	
2. Unsecured Claims otherwise receive PRO-RATA disbursements.	
OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.) Late filed claims filed by creditors will receive no distribution. "Surrenders collateral": Shares/savings in any Cooperativa/Association/Bank. Debtor reserves the right to object claims after plan confirmation.	

Label Matrix for local noticing

0104-3

Case 13-06181-MCF13

District of Puerto Rico

Old San Juan

Mon Apr 14 08:56:16 AST 2014

ASOCIACION EMPLEADOS ELA

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BANCO POPULAR PR

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assignee of Arrow Financial Services,

LLC

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Sallie Mae Inc. On Behalf of The

Department of Education

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End of Label Matrix

Mailable recipients 26

Bypassed recipients 0

Total 26